

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official  
capacity as President of the United States of  
America, et al.,

Defendants.

NO.

DECLARATION OF S.F.

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ATTORNEY GENERAL OF WASHINGTON  
Complex Litigation Division  
800 Fifth Avenue, Suite 2000  
Seattle, WA 98104  
(206) 464-7744

1 I, S.F., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make  
3 this declaration based on my personal knowledge.

4 2. I live in Southwestern Washington with my husband and three children, ages 17,  
5 14, and 12.

6 3. I work in client services in the financial world and my husband is a public school  
7 teacher.

8 4. My oldest child is transgender, assigned female at birth but identifies as male. I  
9 have chosen to refer to him in this declaration as “Child A” because I am fearful for his and my  
10 family’s safety due to the heightened anti-trans rhetoric in the current political climate. It is  
11 important to stand up for my son’s well-being while maintaining his safety and privacy.

12 5. Child A is currently a senior in high school. He participates in a rowing club,  
13 loves history, has a cat he adores, enjoys hiking and nature, and is an avid reader. He is a great  
14 student and has challenged himself with three AP courses this year. He volunteers at our local  
15 library and dreams of becoming a librarian. We recently learned Child A was awarded an  
16 academic achievement scholarship to the university he applied to which is very exciting. We  
17 couldn’t be prouder.

18 6. While our son is currently thriving in so many aspects of his life, it has not always  
19 been this way. When Child A was in 7th grade, he expressed that his gender identity was not  
20 aligning with his biological sex. While he was living in a safe and loving home and got  
21 immediate support and resources from us, it was still a very difficult year and a half. He suffered  
22 from immense depression and anxiety during this time, living trapped in a body that felt foreign  
23 to him. He couldn’t stand the sound of his voice or what he saw when he looked in the mirror  
24 and on Zoom for remote learning. It got to the point where he could barely function. There were  
25 days when he would be curled up in the fetal position on the floor and all I could do was sit with  
26 him and try to be there for him. The helplessness I felt seeing how much my son was suffering

1 was absolutely devastating, and that still doesn't even compare to what I saw that my son was  
2 going through.

3         7. After an extended period of family discussions, counseling sessions, and doctor  
4 appointments, things took a drastic turn for the better when Child A started hormone replacement  
5 therapy just a couple months before he turned 15. He blossomed in every way you can imagine.  
6 He was happier, more confident, and started excelling in school again. His teachers loved his  
7 class engagement and enthusiasm to learn. Child A has been receiving hormone therapy for three  
8 years now and is doing better than ever. After years of wanting to join a local rowing club, he  
9 finally felt confident enough to join the team for his senior year, a truly formative experience  
10 that even inspired the focus of his college essay. All these positive changes in my son are a direct  
11 result of, and could not have been achieved without, gender-affirming care. If the Executive  
12 Order banning gender-affirming care for minors goes into effect, it will be severely detrimental  
13 to my son's quality of life.

14         8. We have already seen the negative impact this Executive Order is having on our  
15 son and our family within just days of its release. Child A's anxiety and his GERD are back, he  
16 is having trouble sleeping, he doesn't feel safe and is scared for his future. As soon as we learned  
17 about the Executive Order, my husband and I sat down with Child A and counted out the number  
18 of doses we have left for his hormone therapy and were able to confirm we have enough to get  
19 him through his 18th birthday. This brought minor relief, until we realized the Executive Order  
20 applies to gender-affirming care for children up to the age of 19, not 18. Since its release, we  
21 also have not been able to communicate with our medical providers to discuss his care, which  
22 has added a lot of stress and fear for our family. Child A's siblings are experiencing anxiety as  
23 well, worried about their big brother. My husband and I are frantically trying to come up with a  
24 plan to ensure our son continues to receive the medical care he needs, even if that means seeking  
25 care outside of the country. The uncertainty of it all is so overwhelming. This has been a very  
26

1 difficult week for our family and a lot of tears have been shed. All we want is for our son to be  
2 safe and happy but right now, because of the threat this Executive Order holds over our son's  
3 wellbeing, our home is now filled with sadness, anxiety and fear.

4 9. I am so grateful that the Washington Attorney General's Office is bringing this  
5 lawsuit as there are many reasons I would be unable to bring it as an individual plaintiff. The  
6 financial burden alone would wipe us out; my husband and I are both full-time working parents  
7 trying to save money to put our three kids through college. We just don't have the time or  
8 financial resources to pursue this kind of action alone. I would also greatly fear for my family's  
9 safety going against the most powerful office in the land that has exhibited a pattern of retribution  
10 behavior.

11 I declare under penalty of perjury under the laws of the State of Washington and the  
12 United States of America that the foregoing is true and correct.

13 DATED this \_\_\_\_\_ day of February 2025, at \_\_\_\_\_, Washington.

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16 \_\_\_\_\_  
S.F.  
Parent of "Child A"

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 10 behavior.

11 I declare under penalty of perjury under the laws of the State of Washington and the  
 12 United States of America that the foregoing is true and correct.

13 DATED this 9<sup>th</sup> day of February 2025, at Camas, Washington.

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 16 S.F.  
 17 Parent of "Child A"  
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